

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF OKLAHOMA**

KIM LOCKWOOD and V. KATHLEEN)	
LOCKWOOD,)	
)	
Plaintiffs,)	
)	
v.)	Case No. CIV-23-170-R
)	
STATE FARM FIRE AND CASUALTY)	
COMPANY,)	
)	
Defendant.)	

**DEFENDANT STATE FARM FIRE AND CASUALTY COMPANY’S FINAL
WITNESS LIST**

Defendant, State Farm Fire and Casualty Company (“State Farm”), below identifies its trial witnesses separated between those who State Farm anticipates will be called and those who may be called at trial. State Farm will supplement, modify or augment these submissions as necessary, due to any permissible changes by Plaintiffs, additional discovery, and as otherwise provided by applicable rule or Court order. Discovery remains ongoing, and State Farm reserves the right to amend this Final Witness List as discovery progresses.

NO.	NAME & ADDRESS	PROPOSED TESTIMONY	EXPECTED/ MAY BE CALLED
1.	Sara Smith Claims Specialist State Farm Fire & Casualty Company c/o Crowe & Dunlevy	Review and assessment of Plaintiffs' hail claim and claim file; communications with Plaintiffs and Ian's Enterprise, LLC regarding Plaintiffs' claim, the date of loss, and other handling of claim; communications with State Farm adjusters and managers and engineer regarding claim; absence of accidental direct physical loss to roof shingles of Plaintiffs' prior property and minor covered damage for certain soft metals; review of Ian's Enterprise, LLC letters and related documentation submitted; review of weather reports for geographic area of Plaintiffs' prior property; Plaintiffs' untimely reporting of claim; Plaintiffs' request to amend date of loss outside of Policy time limits for filing suit; completion of denial letter; hiring of engineer to assist in determining claim and communications with engineer; information as to other allegations in Plaintiffs' Petition as they relate to Ms. Smith's role in the claim; and otherwise regarding State Farm's defenses.	Will be called
2.	Leonard V. Perinn External Claim Resources c/o Crowe & Dunlevy	His inspection of Plaintiffs' prior property on August 18, 2020 and related pictures, scope sheet, and assessments; absence of accidental direct physical loss to roof shingles of Plaintiffs' prior property and minor covered damage for certain soft metals; estimate of damage to Plaintiffs' prior property and response to Plaintiffs' claim under the Policy; information as to other allegations in Plaintiffs' Petition as they relate to Mr. Perinn's role in the claim; and otherwise regarding State Farm's defenses.	Will be called

NO.	NAME & ADDRESS	PROPOSED TESTIMONY	EXPECTED/ MAY BE CALLED
3.	Derek VanDorn Berryman Enterprises, Inc. c/o Crowe & Dunlevy	Subject to his deposition, if any, Mr. VanDorn will testify concerning: the opinions in his expert report; rebuttal of report and opinions by Plaintiffs' designated experts, subject to any admissibility objections as to the testimony of Plaintiffs' designated experts; inspection of Plaintiffs' prior property and determinations regarding any wind or hail-related damage or other damage to the property; cause and extent of damage to the property; evaluation of photos and evidence concerning repairs to property; evaluation of photos and estimates of alleged damage to property by State Farm and Plaintiffs' representatives and opinions concerning the reliability and adequacy of such estimates; construction costs, industry standards regarding calculation and estimating of same, and evaluation of Ian's Enterprise estimate for repairs and replacements on Plaintiffs' prior property; evaluation of report by Chad T. Williams, P.E., of Valor Forensic Engineering Services, LLC and related attachments; evaluation of weather and storm data for the subject property.	Will be called
4.	Tyrone Silva Dias Claims Specialist State Farm Fire and Casualty Company c/o Crowe & Dunlevy 324 North Robinson Avenue, Suite 100 Oklahoma City, OK 73102 (405) 235-7700	Communications with Plaintiffs and Ian's Enterprise, LLC regarding claim and scheduling inspection of Plaintiffs' prior property; first contact with Plaintiffs regarding claim and requests for documentation of public adjuster's representation of Plaintiffs; claim activity and status; information as to other allegations in Plaintiffs' Petition as they relate to Mr. Dias' role in the claim; and otherwise regarding State Farm's defenses.	May be called

NO.	NAME & ADDRESS	PROPOSED TESTIMONY	EXPECTED/ MAY BE CALLED
5.	Jim Ryan Claims Specialist State Farm Fire and Casualty Company c/o Crowe & Dunlevy 324 North Robinson Avenue, Suite 100 Oklahoma City, OK 73102 (405) 235-7700	Communications with Ian's Enterprise, LLC regarding claim, Ian's Enterprise, LLC letters and emails, and denial of claim; claim activity and status; information as to other allegations in Plaintiffs' Petition as they relate to Mr. Ryan's role in the claim; and otherwise regarding State Farm's defenses.	May be called
6.	Darrione Jackson Claims Specialist State Farm Fire and Casualty Company c/o Crowe & Dunlevy 324 North Robinson Avenue, Suite 100 Oklahoma City, OK 73102 (405) 235-7700	Communications with Ian's Enterprise, LLC regarding claim, Ian's Enterprise, LLC letters and emails, and denial of claim; claim activity and status; information as to other allegations in Plaintiffs' Petition as they relate to Mr. Jackson's role in the claim; and otherwise regarding State Farm's defenses.	May be called
7.	Sandra Golden Claims Specialist State Farm Fire and Casualty Company c/o Crowe & Dunlevy 324 North Robinson Avenue, Suite 100 Oklahoma City, OK 73102 (405) 235-7700	Communications with State Farm adjusters and managers regarding claim, Ian's Enterprise, LLC letters and emails, and denial of claim; claim activity and status; information as to other allegations in Plaintiffs' Petition as they relate to Ms. Golden's role in the claim; and otherwise regarding State Farm's defenses.	May be called

NO.	NAME & ADDRESS	PROPOSED TESTIMONY	EXPECTED/ MAY BE CALLED
8.	Janice Shed Claim Specialist State Farm Fire and Casualty Company c/o Crowe & Dunlevy 324 North Robinson Avenue, Suite 100 Oklahoma City, OK 73102 (405) 235-7700	Review of Plaintiffs' claim file; claim activity and status; information as to other allegations in Plaintiffs' Petition as they relate to Ms. Smith's role in the claim; and otherwise regarding State Farm's defenses.	May be called
9.	Mark Wood Team Manager State Farm Fire and Casualty Company c/o Crowe & Dunlevy	May testify to State Farm's investigation and handling of Plaintiffs' claim and State Farm's claim handling practices and procedures as a corporate representative of State Farm.	May be called
10.	Chad T. Williams, P.E. Valor Forensic Engineering Services P.O. Box 783 Jenks, OK 74037	Will be deposed. Communications with Plaintiffs regarding their hail claim; communications with Ian's Enterprise, LLC regarding engagement for inspection and report; report of findings dated December 31, 2020 and related analysis, opinions, and documentation; other allegations in Plaintiffs' Petition as they relate to Valor Forensic Engineering Services' role in Plaintiffs' claim; and otherwise regarding State Farm's defenses.	May be called
11.	Pronet Group, Inc. 1 Sugar Creek Center Blvd. 11th Floor Sugar Land, TX 77478	Communications with State Farm regarding retention to review information and provide an expert report regarding the claim; communications with Plaintiffs and Ian's Enterprise, LLC regarding attempt to schedule inspection; other allegations in Plaintiffs' Petition as they relate to ProNet Group, Inc.'s role in Plaintiffs' claim; and otherwise regarding State Farm's defenses.	May be called
12.	Jimmy Martz	Condition of Plaintiffs' prior property and repairs and replacements for property.	May be called
13.	Gary Baccus Jr. State Farm Agent	Insurance claim of Plaintiffs; and otherwise regarding State Farm's defenses.	May be called

NO.	NAME & ADDRESS	PROPOSED TESTIMONY	EXPECTED/ MAY BE CALLED
14.	Kim Lockwood c/o Foshee & Yaffe	Will be deposed. Claim for damage for Plaintiffs' prior property; sale of property; condition of roof and roof history; contact by and communications with Ian's Enterprise, LLC; engagement of Ian's Enterprise, LLC as public adjuster; inspection by State Farm, Ian's Enterprise, LLC, and Valor Forensic Engineering Services; communications with State Farm and ProNet Group, Inc.; other allegations and claims in Plaintiffs' Petition; and otherwise regarding Plaintiffs' claims and State Farm's defenses.	May be called
15.	V. Kathleen Lockwood c/o Foshee & Yaffe	Will be deposed. Claim for damage for Plaintiffs' prior property; sale of property; condition of roof and roof history; contact by and communications with Ian's Enterprise, LLC; engagement of Ian's Enterprise, LLC as public adjuster; inspection by State Farm, Ian's Enterprise, LLC, and Valor Forensic Engineering Services; communications with State Farm and ProNet Group, Inc.; other allegations and claims in Plaintiffs' Petition; and otherwise regarding Plaintiffs' claims and State Farm's defenses.	May be called
16.	Rebuttal Witnesses		
17.	Witness Identified by Plaintiff and not objected to by State Farm.		
18.	Other witnesses discovered during remaining discovery period or the relevance of whom becomes known during the remaining discovery period.		

Date: October 9, 2023

Respectfully submitted,

/s/ Andrew E. Henry

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**ATTORNEY FOR DEFENDANT
STATE FARM FIRE AND CASUALTY
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CERTIFICATE OF SERVICE

I hereby certify that on this 9th day of October, 2023, I electronically transmitted the foregoing document to the Court Clerk using the ECF system of filing, which will transmit a Notice of Electronic Filing to the following ECF registrants:

Terry M. McKeever
FOSHEE & YAFEE
P.O. Box 890420
Oklahoma City, OK 73189

/s/ Andrew E. Henry

Andrew E. Henry